

## EXHIBIT B

### Declaration of Mellissa Harper

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION

TRISH MACK, as next friend of V.M.L., a  
minor,

Petitioner,

V.

MELLISSA HARPER, et al.,

### Respondents.

Case No. 1:25-cv-00550

## DECLARATION OF MELLISSA HARPER

Pursuant to the authority of 28 U.S.C. § 1746, I, Mellissa Harper, declare that, to the best of my knowledge, information, and belief, and under the penalty of perjury, the following is true and correct:

1. I am a Field Office Director with the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO), in New Orleans, Louisiana. I have been employed by ICE, and the former Immigration and Naturalization Service, in various capacities since September 23, 2001.

2. I am familiar with the current circumstances of Jenny Carolina Lopez Villela and her daughters, including V.M.L.

3. V.M.L. is the minor United States citizen child of Ms. Lopez Villela (A 213 434 708), and Ms. Lopez Villela is V.M.L.'s legal custodian.

4. Ms. Lopez Villela is scheduled to be removed to Honduras on April 25, 2025. Ms. Lopez Villela has expressed that she would like to take her children, including V.M.L., with her.

5. A man named Adiel Mendez Lopez claims to be V.M.L.'s father and has expressed his desire to have V.M.L. placed in the custody of a woman named Trish Mack, the Petitioner in this case. Ms. Mack submitted with her motion a Provisional Custody by Mandate showing that Mr. Mendez Lopez delegated his alleged custodial rights to her. Ms. Mack also submitted with her motion an affidavit asserting her purported connection with the family.

6. However, Ms. Mack and Mr. Mendez Lopez have not provided ICE with information establishing their identity. Moreover, they have provided no evidence of legal custody. As such, there is no basis for ICE to place V.M.L. in Ms. Mack's custody against the stated wishes of V.M.L.'s mother.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 25th day of April 2025.

**MELLISSA B HARPER**

Digitally signed by MELLISSA B  
HARPER  
Date: 2025.04.25 07:57:43 -05'00'

Field Office Director  
New Orleans Field Office  
Immigration and Customs Enforcement  
Enforcement and Removal Operations